

2014 WL 7498366 (N.J.Super.L.) (Trial Motion, Memorandum and Affidavit)
Superior Court of New Jersey, Law Division.
Burlington County

Elizabeth Liggon - REDDING,
v.
KEY PROPERTIES et. al.

No. BURC07708.
2014.

Civil Action

Plaintiffs Motion for Reconsideration

E. L. Redding.

RES JUDICATA (the thing that has been decided: a matter has been adjudged, Doctrine by which “a final judgment by a court of competent **jurisdiction** is conclusive upon the **parties** in any subsequent litigation involving the same cause of action). This doctrine is not appropriate in this instance. There fore the Motion to Dismiss should have been denied In the copious exhibits attached to defendants Motion, “Quiet Title” was not mentioned or litigated at any time whatsoever. The matter was not brought up or. discussed prior to this case now at bar. To the best of the Plaintiff’s knowledge and belief no other Court has jurisdiction over matters of Quiet Title but the Chancery Court.

The Plaintiff has a Constitutional Right to Petition the Court for redress of her grievances. She should not be barred from exercising that right because of the color of her skin or her being indigent. Since **RES JUDICATA** nor **COLLATERAL ESTOPPOL** (the doctrine recognizing that the determination of facts **litigated** between **two** parties in a **proceeding** is binding on those parties in all future proceedings against each other) do not apply in this instance what other reason can she possibly believe when her case is not being allowed to proceed to Trial? Why is she being denied the Jury Trial she requested? Why is she being denied the right to question the Defendants under oath?

In defendants exhibits # 9 page 2 in the footnote the federal court states,” Plaintiffs opposition clearly indicates that she intends to assert only criminal violations.” Criminal charges should not be allowed to preclude the Plaintiff from pursuing a Civil issue also.

In the O.J. Simpson Trials he, the defendant, was found not guilty in the criminal matter but held liable in the civil matter. Was this allowed to be done to him because he is an African American, and the same right denied the Plaintiff because she is also an African American? It is not considered Double Jeopardy when used against an African American, but if used for an African American it is considered Double Jeopardy? Can you really allow such a blatant miscarriage of Justice?

How long do the individuals who are supposed to protect the rights of “John Q Public” intend to allow the rampant misdeeds of the business world to continue? How long will all of you continue to look the other way? Has that policy not done enough damage to the entire American economy? Does continuing placing the public in a position many may never overcome or recover from in their entire life time benefit anyone? Who is supposed to protect the Elderly from “**Elder abuse**?” Where are the individuals who are supposed to be watching the store? Have they all fallen asleep at the wheel?

When will the Plaintiff be allowed to Subpoena Kristin Lapointe, who works for the Title company, to have her explain why she notarized a document containing a signature she did not witness? When will the Plaintiff be allowed to ask someone under Oath

how and by whom her name was handwritten on legal documents and not initialed by anyone as is the law on any contract?. None of these issues have ever been litigated anywhere! If they have with all do respect, will someone anyone please provide proof of that to the Plaintiff? Will some one have the decency to Order any of the defendants to provide the Court and Plaintiff with an obvious non existent **AGREEMENT OF SALE SIGNED BY HER?** Would some one please have the decency to call defendants counsel, on this blatant pernicious prevarication about this document on his part and Order him produce it?! It is contained no where in the exhibits submitted with his Motion to dismiss. Where has this been litigated?

The Plaintiff is supposed to be allowed, under the United States Constitution, to Petition the Court for redress of her grievances. That right is not supposed to be compromised and denied to her or any United States Citizen. The Plaintiffs Rights to have a Jury Trial should not be allowed to be denied her? Why is her right to her day in court being denied her? What is everyone afraid of? The Truth perhaps! Why are legitimate questions asked by the Plaintiff and proof of statements made by defendants counsel being blocked from being answered by the Court? How can you turn a blind eye to the obvious corruption that was perpetrated against the plaintiff by the defendants in this transaction?

Enclosed is a copy the letter the title company wrote to The Insurance Commission telling them another story other than the one defendants attorney wrote in his Motion and testified to in open court. It states, as late a June 2 2008. "At the time of closing she was not a vested owner, Yet in the defendants motion # 1. Defendant entered into a contract to purchase realty from Plaintiff. Where is this alleged **CONTRACT? #3.** "At time of closing Title to Subject Realty was vested in Plaintiff and her husband." To the Insurance Commission it was not vested. To The Honorable Judge Hogan it was vested, which is the truth?

Enclosed is a copy of Plaintiffs Medical Records from Deborah Hospital stating where Plaintiff was when this settlement took place. As truthfully stated by her, she was not at settlement. It is impossible to be in two places at one time. Plaintiff never saw her husband on June 30th 2006 nor, did she see Mr. Tahir or Kristine La Pointe who has sworn she witnessed the Plaintiff signing documents. How many lies will the Court allow the defendants and their Attorney to tell and get away with, with impunity?

In the name of all that is decent will you please reconsider your decision and allow this case to proceed to trial? The Plaintiff in this Motion For Reconsideration certifies that every statement made by her is true, She understands if any are found to be willfully false she can be punished. This Motion is submitted in good faith and not for the purpose of delay.

Respectfully submitted,

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